

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**SEDILLO ELECTRIC and
TELESFOR SEDILLO,**

Plaintiffs,

vs.

No.: 1:15-cv-01172-RB-WPL

**COLORADO CASUALTY INSURANCE COMPANY,
LIBERTY MUTUAL INSURANCE COMPANY,
PEERLESS INSURANCE COMPANY, AND
BAKER INSURANCE SERVICES, L.L.C.,**

Defendants.

Consolidated with:

**SEDILLO ELECTRIC and
TELESFOR SEDILLO,**

Plaintiffs,

vs.

No.: 1:16-cv-43-RB-WPL

**COLORADO CASUALTY INSURANCE COMPANY,
LIBERTY MUTUAL INSURANCE COMPANY, AND
PEERLESS INSURANCE COMPANY,**

Defendants.

PLAINTIFFS' DISCLOSURE OF EXPERT WITNESSES

COME NOW the Plaintiffs, Sedillo Electric and Telesfor Sedillo, by and through their counsel, Eric Sedillo Jeffries, pursuant to FRCP Rule 26(a)(2) and the Court's *Order Setting Pretrial Deadlines and Adopting Joint Status Report* (Doc. 78), filed July 12, 2016, to disclose Plaintiffs' expert witnesses on November 15, 2016 and hereby name:

1. Paul Brenkman
Paul Brenkman, Inc.
2147 Rulon White Blvd., Suite 102
Ogden, UT 84404
Telephone (801) 725-0372

In compliance with FRCP Rule 26(a)(2), a list of Mr. Brekman's qualifications and a

copy of his report that complies with the disclosure requirements of FRCP Rule 26(a)(2) was timely provided to the defendants on November 14, 2016 that addressed his opinion on the hail damage to the roof of Telesfor Sedillo and the bad faith insurance conduct of the defendants. Because Plaintiffs have voluntarily dismissed their vandalism claims, it only addresses the hail claim.

2. Reyes Martinez
NMAZ Adjusting, LLC
P.O. Box 65625
Albuquerque, NM 87193
Telephone (505) 903-8522

In compliance with FRCP Rule 26(a)(2), a list of his qualifications and a copy of his report and appraisals were timely provided to the defendants on November 14, 2016, consisting of:

- Report of November 11, 2016 listing his qualifications
- Combined repair estimate of hail and vandalism damage printed on October 24, 2016
- Repair estimate of hail damage printed November 11, 2016
- 134 photos
- Current bill

The above listed reports, estimates and photos addressed his opinions on the cause of the hail damaged roof and the combined, but separate damages, to the roof, office and garage from the hail and vandalism.

3. Sylvia Ting
current address unknown
c/o Farmers Insurance Company
West Lake Village, CA

Plaintiffs do not believe there should be a necessity to list Sylvia Ting as an expert witness. She is a Farmers Insurance custodian of records. She is listed as an expert but only in caution. Her affidavit was filed in the state case on April 7, 2015 and is Doc 14-1 in this federal action of 1:16cv00043 consolidated with this federal action. Ms. Ting will testify to the hail claims reported and paid by Farmers as the result of the May 13, 2012 Los Lunas hailstorm that is the subject of this litigation. She has not yet been deposed but it is expected she will render an opinion on the quality and accuracy of Farmers' information.

4. Engineer David Grieves and Dr. Randy Lefevre are experts whose initial reports and testimony have already been provided to defendants and by stipulation of the parties have already met the deadline for the Court's disclosure requirements.

Respectfully submitted by:

ERIC SEDILLO JEFFRIES, LLC


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Attorney for Plaintiffs

I hereby certify that a true and correct copy of the foregoing was electronically served upon the following parties of record this 1st day of November 2016:

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